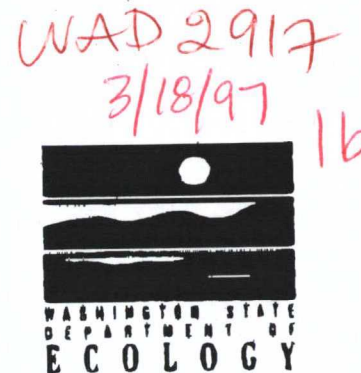


DEPARTMENT OF ECOLOGY  
NORTHWEST REGIONAL OFFICE  
FACSIMILE COVER SHEET



DATE:

6/4/98

TIME:

11:20

Number of Pages:

5

Plus Cover Sheet

TO:

Linda LaiEPA - ALBA

FAX #:

553-8509

FROM:

GALEN TRIT

PHONE:

649-7280

SECTION:

HUTB

Department of Ecology  
Northwest Regional Office  
3190 - 160th Avenue S.E.  
Bellevue, WA 98008-5452  
Phone: (425) 649-7000  
Fax: (425) 649-7098

USEPA RCRA



3012961

COMMENTS:

FILE - File Review that  
SALLY SAFILES (649-7026) Did prior to  
MARCH 97 - NO Final BFE Done -  
Please call SALLY for Details on  
Info. in Files for Claring.

TX GALEN

FILE COPY

August 9, 1995/Revised Jan 12, 1996/Revised March 18, 1997

Terminal 91 CA Events File: CAEVENTS.DOC

LOCATED IN BEI PIER 91 FILES

Aug 1980	Initial Part A permit submitted (Nov 1980, Aug 1984, Dec 1985, Feb 1986, July 1986 following submittals) (From background info from Orders HZW 4.2)
Nov 4 1988	Part B submitted (From background info from Orders HZW 4.2)
March 1988	RFA report. (HZW 6.3.1) [according to IMJQ this was a draft]
March 1988	Draft Phase I Hydrogeologic Investigation (EMCON) (HZW 6.9.1)
May 1988	(Final) Phase I Hydrogeologic Investigation (EMCON). (From background info from order HZW 4.2) WE DO NOT HAVE THIS IN FILES.
Jun 30 1988	EPA 3013 Order issued based on Phase I findings. Purpose to monitor, analysis, and test; sample for Appendix IX 40 CFR 264. (HZW 6.2.1).
Apr 1989	(Phase II) Hydrogeological Investigation by Emcon. (In reference from the RFI report) WE DO NOT HAVE THIS REPORT IN FILES. THIS WAS TO SATISFY 3013 ORDER; INSTALLED 4 SHALLOW WELLS AND 2 DEEP WELLS AND SOIL BORINGS.
May 7, 1990	EPA Agreed Order Docket #1089-11-06--3008(h) issued. To perform RFI and CMS. (HZW 6.2.1)
Sept 4, 1990	Draft work plan for RFI (prepared by EMCON). (HZW 6.3.2.3 tech rept file)
Jan 9, 1991	Ecology Consent Order 90-N243 issued Jan 9, 1991. Dealing with impervious coating to secondary tank containment upgrades. Modified June 12, 1991; satisfied May 25, 1993. (HZW 4.2)
Feb 19, 1992	EPA sends NOD on Sept 4 1990 Draft RFI workplan; also included POS comments on workplan and IM Justification Questions. (HZW 6.3.2)
DATE????	BEI responses to EPA comments on Sept 4, 1990 Draft workplan. No date on comments; Ecology received these April 20, 1992. (HZW 6.3.2)
Apr 17, 1992	RFI Workplan (final). HZW 6.3.2.4)
Jul 9, 1992	EPA approves RFI workplan as final with conditions re DNAPL, Hydro zone interconnection, tidal influence on net GW flow. Attached is EPA Directive re GW remediation at Superfund and RCRA sites. (HZW 6.3.2).



Jul 30, 1992 BEI responses to EPA's July 9, 1992 conditional comments on workplan which was submitted to EPA on April 17, 1992. Re: DNAPL monitoring and hydrological zone interconnection. (H2W 6.3.2.)

Sept 23, 1992 BEI writes to EPA to document agreement on 4 modifications to workplan. (H2W 6.3.2.)

Sept 30, 1992 EPA responses to BEI's July 30, 1992 letter re: DNAPLs monitoring and hydrologic zone interconnection. (H2W 6.3.2.)

Oct 7, 1992 BEI submits Draft workplan for pump test for RFI. (H2W 6.3.2.5)

Oct 7, 1992 BEI submits Draft workplan for tidal monitoring for RFI. (H2W 6.3.2.5)

Nov 3, 1992 Fax from Stiller to Croxton re proposed variance on RFI workplan (actually corrections) on metal sampling and analysis. (copied from EPA files for our files H2W 6.3.2)

Feb 4, 1993 EPA comments on draft pump test and draft tidal monitoring workplan. (H2W 6.3.2)

Feb 24, 1993 Final workplan and responses for tidal monitoring for RFI. (H2W 6.3.2.5)

Feb 24, 1993 Final workplan and responses for Pump Test for RFI. (H2W 6.3.2.5)

Apr 12, 1993 EPA sends Interim Final RFA to POS and BEI (cover letter in files, H2W 6.3.2.)

Apr 15, 1993 Final workplan and responses for Pump Test for RFI. (H2W 6.3.2.5)

May 21, 1993 BEI request 4 variances from RFI workplan re substitution of proposed well CP-120; installation of well CP-122A as a temporary piezometer; discontinued use of well W-10; revision to schedule. (H2W 6.3.2)

June 11, 1993 Letter from BEI to EPA, BEI request a waiver from completing a second tidal study planned for August 1993. (copied letter from EPA files for our files, H2W 6.3.2)

July 28, 1993 EPA allowed temporary variance from conducting a second tidal study until experts reviewed data. (H2W 6.3.2) (H2W 6.3.2)

Aug 25, 1993 EPA approves change of schedule dates for IM questions and draft RFI submittals but needs further evaluations of the three other variance request; (H2W 6.5)

Sept 16, 1993 EPA approves RFI variance for use of temporary piezometer 122A with the decommissioning procedures in Aug. 23, 1993 submittal. (H2W 6.3.2)

Sept 24, 1993 Internal Memo to Stiller from Maloy, data supplemental for request for variance from workplan to substitute MW 39-3 for CP-120. (copied from EPA files to our files; assumed this memo was sent to Croxton as indicated from EPA's data base, HZW 6.3.2)

Sept 27, 1993 BEI submits Draft Reponse to IMJQ. (HZW 6.5)

Sept 29, 1993 BEI responses to EPA's March 31, 1993 comments on the interim Final RFA. (HZW 6.3.1)

Oct 15, 1993 EPA comments on ~~outstanding issues of RFI~~: pump test; substitution of well 39-3; monitoring well W-10; tidal monitoring test. (HZW 6.3.2)

Oct 25, 1993 Submittal of Draft RFI report (picked up from correspondence WE DO NOT HAVE THIS WE NEED TO GET THIS REPORT SINCE IT HAS FIGURES NOT REPRODUCED IN FOLLOWING SUBMITTALS)

Oct 25, 1993 EPA responses on Draft IMJQ. (HZW 6.5)

Nov 12, 1993 BEI recaps what was agreed to in a meeting and phone conversations with EPA on outstanding issues for RFI on the 4 task above (see Oct 15, 1993). (HZW 6.3.2)

Nov 19, 1993 (Final) Pump Test workplan for RFI. (HZW 6.3.2.5)

Nov 24, 1993 BEI sends revisions to the IM Justification Questions to EPA based on EPA's Oct 25, 1993 review of the Draft IMJQ submitted on Sept 27, 1993 and the (Final) Responses to IMJQ report. (HZW 6.5)

Dec 17, 1993 EPA denies BEI's request to remove W-10 from water level measurements and WQ sampling. (HZW 6.3.2)

Jan 14, 1994 BEI request variance from the installation of dedicated sampling equipment. (HZW 6.3.2) [plan on installing low flow dedicated pumps in wells w/o product and dedicated stilling tubes in wells with product; sampling w/ these Jan 1994?]

Jan 14, 1994 BEI sends EPA copies of tables (5-1 through 5-28) missing from the Oct 25, 1993 submittal of draft RFI report. (HZW 6.3.2.7)

Feb 15, 1994 EPA approves BEI's request for use of dedicated sampling equipment and low-flow sampling techniques (Jan 14, 1994 letter); EPA also approves procedures for detecting NAPL. (HZW 6.3.2).

Feb 17, 1994 BEI sends EPA copies of revised Figure G-14 and Appendix G for draft RFI report. (HZW 6.3.2.7)

Mar 29, 1994 Letter from EPA to Lavoie (BEI) regarding the need for Interim Measures; requires BEI to design an IM workplan to address LNAPL. (copied from EPA files to our files, HZW 6.5).



Apr 25, 1994 BEI request an extension of 30 days for submittal of IM Workplan to address LNAPL. (H2W 6.5)

Apr 25, 1994 BEI seeks permission from POS to use Well MW-39-3 in the IM workplan to use as a recovery well for LNAPL. (H2W 6.5)

May 11, 1994 EPA approves 30 extension of IM workplan. (H2W 6.5)

May 26, 1994 POS responses to BEI re: use of well MW-39-3 for initial phase of LNAPL recovery. (H2W 6.5)

Jun 15, 1994 BEI submits DRAFT IM Workplan; use 7 recovery wells from existing network. (H2W 6.5)

Sept 10, 1994 DRAFT MWSA permit [from Croxton personal file]

Sept 15, 1994 EPA approves Interim Measures Workplan but EPA is disappointed that they did not include hydraulic control for LNAPL. (H2W 6.5) [EPA approved the draft as final].

Nov 4, 1994 EPA sends comments on first draft of RFI to BEI. (copied from EPA files for our files H2W 6.3.2)

Nov 4, 1994 Final RFA report include POS/BEI. (H2W 6.3.1.3)

Nov 22, 1994 EPA sends figures 1-6 which were omitted with their comments sent Nov 4, 1994; EPA extends deadline for submittal of responses to RFI reports comment to 60 day from receipt of this letter. (H2W 6.3.2.5)

Feb 10, 1995 RFI Report (draft) revisions to Oct 1993 Draft RFI Report responding to EPA comments; recieved at Ecology Nov 23, 1994. Many figures, tables, and appendices not included since they did not change from the initial draft. (H2W 6.3.2.5)

Jun 29, 1995 Philip's sends a report to justify decrease frequency of water quality sampling and frequency of water level measurements. (H2W 6.3.2.1)

Nov 15, 1995 BEI sends request to Ecology on abandonment and replacement of well cluster 105 A/B; includes workplan. (H2W 6.3.2.2)

Nov 30, 1995 EPA/Ecology response to BEI for well abandonment and replacement request for wells 105 A/B. (H2W 6.3.2)

Dec 15, 1995 EPA/Ecology responses to BEI on request to decrease monitoring frequency with comments and conditions. (H2W 6.3.2)

Mar 27, 1996 EPA transfer all pemitting, closure and CA to Ecology (H2W 6.3.2)

April 3, 1996 Ecology clarifies issues and duties for the transfer of T91 from EPA. (H2W 6.3.2)

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**LOCATED IN PORT OF SEATTLE TERMINAL 91 TANK FARM FACILITY  
FILES**

July 3, 1996 Ecology notifies PNO, Philip, POS as PLPs for the Tank Farm area. (H2W 6.6)

July 3, 1996 Ecology sends to Port a notice to allow them to use the IRAP process for the rest of the site. (H2W 6.6)

August 1, 1996 PNO sends reply to PLP notice that they feel BEI should take lead for continue CA at site. (H2W 6.6)

August 15, 1996 Ecology sent out the final status as PLPs to POS, Philip, and PNO. (H2W 6.6)

Oct 10, 1996 Ecology sent to PNO and POS the cost recovery alert letter for cost accruing for corrective action at the site. (H2W 6.6)

Nov 13, 1996 Ecology Memo to files regarding cost recovery for Ecology's review of decrease monitoring request and the relocation of wells 105A/B. (H2W 6.6)

Feb 5, 1997 Ecology sent of PLPs the cover letter and a draft copy of the agreed order. (H2W 6.6)

March 10, 1997 Ecology sent to PLPs the final scoring and ranking using MTCA's WARM.; Converted 10CAPS to WARM with the ranking of 1. (H2W 6.6)

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**POS FILES (GENERAL T91) Non-Hazardous Waste Files**

Aug 1990 DRAFT Preliminary Underground Tank Assessment Vol I and II by ERM-NW (POS T-91 files).

Sept 1990 [Final] Preliminary Underground Tank Assessment by ERM-NW (POS T-91 files).